

# **EXHIBIT 6**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

**UNITED STATES OF AMERICA ex  
rel.  
CAMERON JEHL,**

**Plaintiffs,**

**v.**

**GGNSC SOUTHAVEN LLC D/B/A  
GOLDEN LIVING CENTER-  
SOUTHAVEN et al.**

**Defendants.**

Case No. 3:19cv091-MPM-JMV

**DECLARATION OF JAN G. AHRENS IN SUPPORT OF DEFENDANTS'  
APPLICATION FOR ATTORNEYS' FEES AND OTHER EXPENSES**

I, Jan G. Ahrens, Esq., having personal knowledge of the facts contained in this Declaration and being competent to testify to them, hereby state as follows:

1. I am an attorney licensed to practice in the Commonwealth of Kentucky. I am a Partner at the firm of Quintairos, Prieto, Wood & Boyer, PA. I represented Defendants in this matter for the sole purpose of reviewing and finalizing production of Electronic discovery documents. My work in this matter started on February 4, 2021 and was completed on April 23, 2021.

2. I focus my practice on nursing home litigation and in particular electronic discovery.

3. For this project, I was asked to review electronic data to determine the documents that would be responsive to the Court Order. I solely worked on this assignment. For the period, February 21-23, 2021, I reviewed documents to determine

those responsive to the Order and redacted those documents in accordance with the Order. For the period, April 21-23, 2021, I performed a second review of electronic discovery to determine which documents were responsive to the Court Order.

4. My firm charged \$198.00 per hour for my services. I worked 10.1 hours from February 4 -12, 2021 for a total charge of \$1999.80. I worked 22.5 hours for the period from April 21-23, 2021 for a total charge of \$4455.00.

5. Our firm's billing statements detail the work that was done on this case. *See* Exhibit A. The number of hours expended on all legal tasks was reasonable, given the complexity, length, and importance of this case.

6. Our firm's billing statements also outline the expenses incurred to represent Defendants in the litigation which were charged and paid in full.

DocuSigned by:

*Jan Ahrens*

Jan G. Ahrens, Esq.

Executed on this <sup>27</sup>\_\_\_\_ day of April, 2023